

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION**

IN RE:
Edward C Goodwin
Deborah F Goodwin
SS#: XXX-XX-3080 XXX-XX-2747
DEBTORS

CASE NO. 10-83091-CRJ-13

CHAPTER 13

TRUSTEE'S MOTION TO MODIFY CHAPTER 13 PLAN

COMES NOW, Michael Ford, the Chapter 13 Trustee in the above styled case, and moves this Court to modify Debtors' plan confirmed October 06, 2010; and as grounds therefore, the Trustee would show unto the Court as follows:

1. The Debtors' Chapter 13 plan presently calls for payments of \$167.00 weekly to the Chapter 13 Trustee.
2. The Debtors are in material default with respect to the terms of the Chapter 13 Plan. The total delinquency is \$3,313.70 through 03/31/2015.
3. In order for the plan to complete as confirmed, the Trustee proposes to increase the Chapter 13 Plan payments to the amount of \$841.00 monthly beginning in May 2015 for the remaining 7 months of the plan to cure the default.

WHEREFORE, the Trustee moves for an order modifying the plan pursuant to 11 U.S.C. § 1329 and Rule 3015(g) to increase the Chapter 13 Plan payments to the amount of \$841.00 monthly, beginning May 01, 2015 for the remaining 7 months of the plan to cure the default, with a six month probationary period beginning May 2015 wherein if plan payments are not made within the month in which they are due, the Trustee may obtain an order of dismissal without further notice. The plan is hereby extended by 4 months through NOVEMBER 2015. Other provisions: All other provisions to remain the same.

RESPECTFULLY SUBMITTED, this the 9th day of April, 2015.

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE U. S. BANKRUPTCY COURT AND A COPY SERVED ON THE CHAPTER 13 STANDING TRUSTEE WITHIN TWENTY-ONE (21) DAYS FROM DATE OF SERVICE HEREOF. ANY OBJECTIONS FILED WILL BE HEARD BY THE COURT ON THE **5TH DAY OF MAY, 2015, AT 9:00 A.M. IN THE BANKRUPTCY COURTROOM, US POST OFFICE & COURTHOUSE, 210 N SEMINARY ST, 2nd FLOOR COURTROOM, FLORENCE AL 35630.** THIS MOTION WILL BE GRANTED UNLESS AN OBJECTION IS FILED WITHIN TWENTY-ONE (21) DAYS.

/s/ Michael Ford

MICHAEL FORD, TRUSTEE
P.O. BOX 2388
DECATUR, AL 35602-2388
(256)350-0442

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the above Motion upon the Attorney for the Debtors and the Debtors , by mailing a copy of the same with adequate postage thereon or by electronic means when available:

Edward C Goodwin
Deborah F Goodwin
1103 Burroughs Ave
Muscle Shoals, AL 35661

BOND BOTES SYKSTUS TANNER &
MCNUTT
102 S COURT STREET STE 314
FLORENCE, AL 35630

This the 9th day of April, 2015.

/s/ Michael Ford

Michael Ford, Trustee